

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

SOPHIA SAHAGÚN, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

THEMIS BAR REVIEW, LLC,

Defendant.

Case No. 1:24-cv-02065

JOINT MOTION TO MODIFY DATES IN PRELIMINARY APPROVAL ORDER

Plaintiff Sophia Sahagún (“Plaintiff”) and Defendant Themis Bar Review, LLC (“Defendant”) (together, the “Parties”) respectfully request that the Court enter an Order modifying certain dates and deadlines in the Court’s preliminary approval order. (Dkt. 80, the “Preliminary Approval Order.”). In support of this motion, the Parties state as follows:

1. On October 20, 2025, the Court entered an Order preliminarily approving the proposed class action settlement of this matter, directing that notice be sent to the Settlement Class, and appointing Epiq Class Actions and Claims Solutions (“Epiq”) as the Settlement Administrator.¹ (Dkt. 80). The Preliminary Approval Order includes certain dates and deadlines by which events related to the Settlement are to occur. This includes the implementation of a Notice plan, with later deadlines keyed off of the date Notice is sent to the Settlement Class. The Preliminary Approval Order further sets a Final Approval Hearing for January 26, 2026.

2. Since the Court entered the Preliminary Approval Order, Class Counsel has worked with Epiq to finalize Notice documents, ensure that the Settlement Website contained everything called for in the Settlement and was accessible to the public.

¹ Unless otherwise defined, all capitalized terms have the meaning ascribed to them in the Settlement Agreement. (Dkt. 78-1).

3. However, Defendant requires additional time to compile the complete and final class list, which rendered Epiq unable to disseminate Notice on November 14, 2025, as the Preliminary Approval Order required.

4. Defendant has committed to transferring the complete and final class list to Epiq on or before November 21, 2025, and Epiq has advised that it will need at least 21 days to analyze the data before disseminating Notice.

5. Accordingly, the Parties jointly request that the Court modify the current deadlines as follows:

Event	Current Date	Requested Date
Notice Date	November 14, 2025	December 23, 2025
Plaintiff's Deadline to File Fee Petition	December 15, 2025	January 23, 2026
Objection/Exclusion Deadline	December 29, 2025	February 6, 2026
Claims Deadline	December 29, 2025	February 6, 2026
Plaintiff's Deadline to File Motion for Final Approval	January 13, 2026	February 20, 2026
Final Approval Hearing	January 26, 2026	March 6, 2026, or as soon thereafter as the Court is available

6. Besides these dates, the Parties are not seeking to modify any other element of the Preliminary Approval Order. Should this Motion be granted, the Parties will make sure these dates are included in all forms of the Notice and posted, along with any resulting order, on the Settlement Website.

7. The Parties respectfully submit that good cause exists to grant the required relief, and that it is not being sought for any improper purpose. Rather, it is being done to ensure that

accurate Notice timely reaches as many Settlement Class Members as possible and that all Settlement Class Members are afforded the claims period called for in the Settlement.

DATED: November 17, 2025

Respectfully submitted,

/s/ Philip L. Fraietta

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**Admitted Pro Hac Vice*

Counsel for Defendant Themis Bar Review, LLC

CERTIFICATE OF SERVICE

I hereby certify that on November 17, 2025, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

s/ Philip L. Fraietta
Philip L. Fraietta